

TECHNICAL MEETING
NAS BRUNSWICK, MAINE

December 3, 1998

ATTENDEES:

<u>NAME</u>	<u>ORGANIZATION</u>	<u>PHONE</u>
Emil Klawitter	Northern Division	
Jason Speicher	Northern Division	
Tony Williams	NAS Brunswick	
Mike Barry	USEPA	
Denise Messier	MEDEP	
Rich Kaselis	MEDEP	
Claudia Sait	MEDEP	
Larry Dearborn	MEDEP	
Carolyn Lepage	BACSE Tech. Advisor	
Tom Fusco	BACSE	
Peter Nimmer	EA Engineering	
Jeff Brandow	Harding Lawson Associates	

MEETING DATE: December 3, 1998, 9:00 a.m.

MEETING LOCATION: NAS Brunswick, ME

Note: these minutes cover only the morning session of the meeting, which was devoted entirely to discussion of the Building 95 site closure

I. INTRODUCTION

Tony Williams (NASB) opened the meeting. Introductions were made around the table. Present for this meeting were Denise Messier and Rich Kaselis from MEDEP, to discuss issues specifically related to Building 95 site closure and the MEDEP Board Order under the Maine RCRA program.

II. BUILDING 95 SITE CLOSURE

Emil Klawitter handed out copies of the Navy's response to comments on the draft final Closure Report. The Navy would like to reach an agreement on how to close out the Building 95 site, and what additional information is needed. He then reviewed some of the history of this site:

- a) MEDEP issued a Board Order for the site in 1991, which established closure requirements;
- b) MEDEP, EPA and the Navy agreed to address the site under the IRP in 1991;
- c) an EE/CA and Action Memorandum were then prepared, which included a risk assessment to set PRGs;
- d) two sets of PRGs were established: shallow soils (based on ecological risk) and deeper soils (based on health risk to a construction worker);

- e) shallow PRGs covered DDT and pyrethrins; deep PRGs included just DDT, since there was no human health issue with pyrethrins;
- f) during implementation of the remedial action, an area of excess soils south of Avenue B exceeding the shallow (eco) PRGs was relocated to a previously excavated area south of Avenue B, where it was subsequently covered by 2 feet of clean soil; a geotextile was placed between the relocated soil and the clean fill to serve as a marker (Jeff Brandow reported that the engineer's log book includes an entry confirming placement of the geotextile);
- g) samples were collected from beneath Avenue B, and results were all below PRGs;
- h) site monitoring wells are all located north of Avenue B, near the source area.

Emil pointed out that the Navy would like to address groundwater issues for this site under the long-term monitoring program, and the site Closure Report should address only the soil removal action that the Navy implemented. He said this meeting would focus on the soil issues that needed to be resolved to close the site out under the Maine RCRA program.

Claudia Sait stated that the problem we are now facing is primarily procedural. A closure report is used to document a clean closure. If this is not considered a clean closure, then the closure report doesn't work.

Rich Kaselis said that a closure report must certify that the waste and all constituents have been removed to the point that there are no restrictions required for the site (i.e., it would be suitable for residential use).

Denise Messier also pointed out that MEDEP does not typically use a two-foot depth as the cutoff for residential risk. They usually look at six feet, which is the depth of a typical basement.

Emil said that the Navy had assumed that any excavations deeper than two feet would be made by construction workers, which would involve different exposure assumptions than with residential receptors. The construction worker scenario was used to develop the deep soil PRG of 135 mg/kg.

Denise asked if the Navy would have a problem with establishing use restrictions for the site. Emil replied that the Navy does have a problem with restrictions, since it is their responsibility to enforce the restrictions forever, even if the property is transferred.

Tom Fusco stated that the assumption that deep soils stay deep may be faulty. If the soil is dug up, it may then be spread on the surface and exposures would increase for residents. This triggered a lengthy discussion on risk assessment methods, the adequacy of the PRGs, and the appropriateness of the two-foot depth as the shallow/deep boundary. Tony and Denise left the room to obtain a copy of MEDEP's remedial action guidelines (Table 4, attached) off the internet.

Emil indicated that the draft final Closure Report contained a table of confirmation sampling results. Results are all below the PRGs and below the Maine remedial action guidelines, except for the final sample in the table, which was later shown to be inaccurate by the direct-push samples, taken in May 1998.

Denise said that, substantively, the remedial action seems to have met its requirements. Claudia asked about the concentrations in the relocated soil. Jeff Brandow reported that the three samples taken from that soil contained DDT at concentrations ranging from 0.88 to 34 mg/kg.

Denise said the issue that remains is how to make sure the soil that remains on site in excess of the ecological PRG stays below the two-foot depth if we don't have institutional controls. Claudia asked if the Navy would

consider going back and digging up the soil. Emil replied that the Navy would not, if it meant removing all soil that exceeded 0.5 mg/kg everywhere on the site.

Denise said she still doesn't see how to avoid use restrictions. Larry Dearborn suggested paving the site, but that is not viewed as a desirable end use of the property. Tony mentioned that the Navy can control the use of the site while it remains the owner, and the issue would be re-opened if NAS Brunswick ever goes into the BRAC process.

Emil said the Navy isn't usually required to look at ecological risk for soils greater than two feet below ground surface, and often the depth limit is shallower than that. He then wondered, if the confirmation sample results were all averaged together, whether the average concentration would meet the eco-risk level. Denise replied that would be an option, if the Navy could show statistically that site conditions meet the eco-risk PRG, based on an average concentration at some upper confidence level.

Emil suggested that the 0.5 mg/kg PRG seems conservative, especially when compared to application rates that were typical for DDT. Rich Kaselis said that this is an entirely different situation from application of the pesticide, since the DDT at Building 95 was the result of spills.

Denise reiterated that the main issue is how to ensure that the deep soil remains below two feet. The Navy must either document that the entire soil column meets ecological PRGs, or come up with a way to ensure that the layers will not be disturbed.

Claudia asked if the Building 95 site should be added to the FFA. Jeff asked if that would mean that a proposed plan and ROD would be required. Mike Barry indicated he did not think we should add the site to the FFA, but he thought we could agree on an approach to control future use of the site. Tom Fusco also thought that was the right way to go.

Emil stated that everyone seems to agree that the remaining soil concern is in regard to ecological risk. Therefore, as a start, the Navy will prepare a technical memo that evaluates the eco-risk concern. Disturbance of the site is not an immediate issue since the site is already included in the NAS Brunswick "no-dig instruction".

Emil then asked, if the eco-risk issue can be resolved, whether the site could then be closed with the Closure Report. Rich responded that we may be able to, although MEDEP may need to pursue a revision to the Board Order. Mike Barry also recommended that the parties complete a consensus statement, so that the decisions reached on this site are well-documented for future decision-makers who may be reviewing the status of the site.

Emil summarized that the Navy's next step would be to prepare a technical memo that evaluates the ecological concerns. The remaining groundwater issues will be addressed under the long-term monitoring program. Groundwater monitoring for this site will continue to be addressed separately from the other sites on NAS Brunswick, with a separate monitoring plan and its own monitoring reports.

Rich asked why the Navy wants to separate the groundwater and soil issues at this site. He thought it would be easier to address the site in a single package. Emil replied that the soil issues seem to be able to be addressed right now, while it may be some time before the remaining groundwater issues are resolved. The Navy would like to get the soil issues over and done with now, so we won't be back here in a couple of years trying to remember what had been previously decided.

Mike Barry suggested that the Closure Report be revised to address the soils, and a consensus statement be used to agree on a groundwater monitoring plan and the future decision-making process.

Claudia asked the Navy to lay out a timeline of the remaining activities for this site. Emil suggested the following:

1. prepare a technical memo on the eco-risk issues;
2. hold a technical meeting to discuss groundwater monitoring and related issues;
3. revise the Closure Report, perhaps as an Interim Closure Report;
4. prepare a Consensus Statement; and
5. eventually, issue a Final Closure Report.

At 11:45 a.m., discussion of the Building 95 site was concluded and participants broke for lunch. The remainder of the meeting is scheduled to discuss groundwater monitoring at Site 2. Those discussions are not included in these minutes.